

1 DAVID E. McALLISTER (AZ BN 021551)
2 JOSEPHINE E. PIRANIO (AZ BN 020630)
3 PITE DUNCAN, LLP
4 4375 Jutland Drive, Suite 200
5 P.O. Box 17933
San Diego, CA 92177-0933
Telephone: (858) 750-7600
Facsimile: (619) 590-1385
jsalmon@piteduncan.com

6 Attorneys for GMAC MORTGAGE, LLC

7

8

9 UNITED STATES BANKRUPTCY COURT

10 DISTRICT OF ARIZONA - PHOENIX DIVISION

11 In re

Case No. 2:09-bk-21230-RJH

12 THOMAS DANIEL HEDBERG, JR. AND
13 REBECCA ANN HEDBERG,

Chapter 7

14 Debtor(s).

15 GMAC MORTGAGE, LLC'S REQUEST
FOR SPECIAL NOTICE AND SERVICE
OF PAPERS AND RESERVATION OF
RIGHTS

16

17 TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL
18 INTERESTED PARTIES

19 PLEASE TAKE NOTICE that the firm of PITE DUNCAN, LLP, attorneys
20 for GMAC Mortgage, LLC hereby requests special notice of all events relevant to the above-
21 referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-
22 referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy
23 Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests
24 for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of
25 all matters which must be noticed to creditors, creditors committees and parties-in-interest and other
26 notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the
27 above-referenced bankruptcy court.

28 PITE DUNCAN, LLP, requests that for all notice purposes and for inclusion in the
Master Mailing List in this case, the following address be used:

Josephine E. Piranio
PITE DUNCAN, LLP
4375 Jutland Drive, Suite 200
P.O. Box 17933
San Diego, CA 92177-0933

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim, proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

- a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

b. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

- c. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved by this party without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: September 16, 2009

PITE DUNCAN, LLP

/s/Josephine E. Piranio
JOSEPHINE E. PIRANIO
Attorneys for GMAC MORTGAGE, LLC

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing REQUEST FOR SPECIAL NOTICE AND SERVICE OF PAPERS AND RESERVATION OF RIGHTS was served on September 16, 2009. Service was accomplished by the method and to the following as indicated:

BY ELECTRONIC NOTICE OR FIRST CLASS MAIL

Thomas Daniel Hedberg, Jr.
Rebecca Ann Hedberg
349 East Arabian Drive
Gilbert, AZ 85296

Elizabeth Ann Yoo
Wilson-Goodman & Fong PC
538 S Gilbert Rd #101
Gilbert, AZ 85296

S. William Manera
P.O. Box 44350
Phoenix, AZ 85064-4350

U.S. Trustee
Department of Justice
230 North First Avenue Suite 204
Phoenix, AZ 85003

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on September 16, 2009, at San Diego, California.

Marissa Telle